

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Jennifer Rebecca Lambert
Brent Deray Lambert, Debtors**

**Case No. 25-50502-KMS
CHAPTER 7**

NOTICE OF MOTION TO PARTIALLY AVOID JUDICIAL LIEN

YOU ARE HEREBY NOTIFIED that a Motion to void the Judgment Lien of 1st Franklin Financial Corporation has been filed on behalf of Jennifer Rebecca Lambert and Brent Deray Lambert.

YOU ARE HEREBY FURTHER NOTIFIED that TWENTY-ONE (21) DAYS from the date of this Notice are granted in which a written objection or other responsive pleading must be filed with Clerk, U.S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran United States Courthouse, 501 E. Court St., Suite 2.300, Jackson, MS 39201; and with the undersigned attorney for the Trustee at the address listed below. If no objections are filed, the Court may consider this matter EX PARTE. Should objections be filed, a hearing will be held on the aforesaid Motion at a date to be later determined by the Court.

Date: May 15, 2025

Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
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Jackson, MS 39236
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Jennifer Rebecca Lambert
 Brent Deray Lambert, Debtors**

**Case No. 25-50502-KMS
 CHAPTER 7**

MOTION PARTIALLY AVOIDING JUDICIAL LIEN

COME NOW, Debtors, by and through counsel, pursuant to 11 U.S.C. §522(f) and Bankruptcy Rule 4003(d), and files this their Motion to void the Judgment Lien of 1st Franklin Financial Corp. (“Respondent”), and in support thereof, would show the Court as follows:

I.

Debtors commenced this proceeding under Chapter 7 of the Bankruptcy Code on 04/08/2025.

I.

That the Debtors have a Judgment Lien against them obtained by 1st Franklin Financial Corp. entered in the Justice Court of Jones County, Mississippi, in the amount of \$2,003.82, enrolled in the Judgement Roll maintained by the Jones County Justice Court Clerk and filed at Docket 9303 at page 215, on their homestead located at 812 Pecan Grove Road, Ellisville, Jones County, Mississippi 39437, being more fully described as follows:

Commence at an axle marking the Southwest corner of the Southwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of section 31, Township 8 North, Range 11 West, First Judicial District, Jones County, Mississippi, and run North 00, 00’55 East for 795.97 feet to a $\frac{1}{2}$ ” rebar on the West edge of Pecan Grove Road, for the point of beginning; Thence run North 00, 00’06 East for 209.00 feet to a $\frac{1}{2}$ ” rebar; Thence run West for 209.00 feet back to the point of beginning. Said parcel of land is a part of the Southwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 31, Township 8 North, Range 11 West, First Judicial District, Jones County, Mississippi and contains 1.00 acre more or less.

Indexing Instructions: SW $\frac{1}{4}$ of SE $\frac{1}{4}$, of Section 31, Township 8 North, Range 11 West, 1st Judicial District, Jones County, Mississippi.

II.

That the Debtors seek an Order from this Court voiding the Judgment listed in Paragraph II above to the extent it is a lien against their homestead and impairs the debtors' right to claim their homestead exemption pursuant to §85-3-21, Mississippi Code of 1972.

WHEREFORE, Debtors respectfully request that this Court enter an order voiding the lien of 1st Franklin Financial Corp. against them which impairs their homestead exemption, and for such other relief as is deemed just.

Dated May 15, 2025

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice of Right to Request Hearing and Motion to Partially Avoid Lien was forwarded on May 15, 2025, to:

By First Class U.S. Mail, Postage Prepaid:

1st Franklin Financial Corp.
2001 Hwy 15 N. Ste A
Laurel, Ms 39440

By Electronic CM/ECF Notice:

Case Trustee
U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.